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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREMICHAEL GHEBREYESUS,
individually and as Trustee of the Estate of
Ghebreyesus Ghebrelul Fremichael; and
SIMRET ZERAI YOHANNES (A/K/A
SEMRET ZEREYOHANS KELEB,

Plaintiffs,

vs.

THE FEDERAL DEMOCRATIC REPUBLIC
OF ETHIOPIA, THE MINISTRY OF
FOREIGN AFFAIRS OF ETHIOPIA, THE
CITY OF ADDIS ABABA, et al.,

Defendants.

Case No.: 2:22-cv-01717-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE DEADLINE**

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STIPULATION AND ORDER TO EXTEND DISPOSITIVE DEADLINE

Under Local Rules IA 6-1, 7-1, and 26-3, Plaintiffs Fremichael Ghebreyesus, individually and as Trustee of the Estate of Ghebreyesus Ghebrelul Fremichael, and Simret Zerai Yohannes (“Plaintiffs”) and Defendant Brook Bekele Beshah (“Bekele”), stipulate, agree, and respectfully request that the Court extend the dispositive deadline in the Scheduling Order entered by this Court on November 20, 2024 [ECF. No. 112]. This is the Parties’ sixth request to adjust the deadlines in this case, though each time only incremental adjustments were made for good cause. Specifically, the Parties are requesting a brief extension to the dispositive deadline to accommodate some scheduling conflicts that have arisen as a result of conflicting trials for the undersigned in unrelated cases. Specifically, counsel for Defendant Bekele has been in trial for approximately the last month, which has resulted in delays associated with preparing the necessary dispositive motion in this case. This was compounded by post-trial briefing that has been more extensive than previously forecasted. *This request only seeks to modify the dispositive deadline in this case.*

I. Statement Specifying the Discovery Completed.

1. Plaintiffs served their initial disclosures on May 25, 2023.
2. Bekele served his initial disclosures on May 25, 2023.
3. Plaintiffs served their First Set of Requests for Production of Documents on Bekele on June 15, 2023. Bekele served his responses on July 28, 2023.
4. Bekele served his first supplement to initial disclosures on July 28, 2023.
5. Bekele served his First Set of Interrogatories, First Set of Requests for Admissions, and First Set of Requests for Production of Documents on Plaintiffs on November 16, 2023. Plaintiffs served their responses on January 18, 2024.
6. Bekele served his second supplement to initial disclosures on December 13, 2023.
7. Bekele served his Second Set of Requests for Production of Documents on Plaintiffs on January 24, 2024. Plaintiffs served their responses on February 26, 2024.
8. Plaintiffs served their first supplement to initial disclosures on February 5, 2024.
9. Bekele served his third supplement to initial disclosures on February 7, 2024.

10. Bekele served his fourth supplement to initial disclosures on February 9, 2024.

11. Plaintiffs served their second supplement to initial disclosures on April 1, 2024.

12. Bekele served his fifth supplement to initial disclosures on April 5, 2024.

13. Plaintiffs served their third supplement to initial disclosures on May 14, 2024.

14. On May 15, 2024, Plaintiffs served their First Set of Interrogatories, First Set of Requests for Admissions, and Second Set of Requests for Production of Documents. Bekele responded on June 28, 2024.

15. Bekele took the deposition of plaintiff Fremichael Ghebreyesus on June 12, 2024.

16. Plaintiffs took the deposition of Bekele on June 13, 2024.

17. Bekele served his sixth supplement to initial disclosures on June 28, 2024.

18. Bekele served his seventh supplement to initial disclosures on July 12, 2024.

19. Bekele took the deposition of non-party Philip Gould on July 19, 2024.

20. Plaintiffs served their fourth supplement to initial disclosures on August 30, 2024.

21. Bekele served his eighth supplement to initial disclosures on September 13, 2024.

22. Bekele served his ninth supplement to initial disclosures on October 28, 2024.

23. Bekele and Plaintiffs served their respective expert disclosures (October 31, 2024) and rebuttal disclosures on December 20, 2024.

II. A Specific Description of The Discovery That Remains To Be Completed.

24. All discovery has been completed.

IV. Proposed Extension of Dispositive Deadline.

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Dispositive Motions	February 24, 2025	March 14, 2025
Pre-Trial Order	March 24, 2025	30 days from the Court's entry of an order on dispositive motions, if any, or April 24, 2025, whichever is later.

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1 **IT IS SO STIPULATED.**

2 Dated this 31st day of January 2025.

Dated this 31st day of January 2025.

3 **BECKSTROM & BECKSTROM, LLP**

MCDONALD CARANO, LLP

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5 By: /s/ James A. Beckstrom

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Attorneys for Plaintiffs

26 **IT IS SO ORDERED.**

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28 UNITED STATES MAGISTRATE JUDGE

DATED: February 3, 2025